

) COUNT 11:
) POSSESSION OF FIREARM IN
) FURTHERANCE OF DRUG
) TRAFFICKING
) Vio. 18 U.S.C. § 924(c)(1)(A)(i)
)
) CRIMINAL FORFEITURE
) ALLEGATION:
) 21 U.S.C. §§ 853(a) and (d)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning on or about October 17, 2012, and continuing thereafter to a date unknown to the Grand Jury, but at least until February 22, 2013, within the District of Alaska, the defendants, CHRISTOPHER THOMAS MEJIA, JARED THOMAS BOWERS, and RHADAMES MARMOLEJOS, JR., together with other co-conspirators unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute, and to possess with intent to distribute, a controlled substance, to wit: one kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, § 841(a)(1).

All of which is in violation of Title 21, United States Code, §§ 846 and 841(b)(1)(A).

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COUNT 2

On or about October 17, 2012, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

COUNT 3

On or about November 2, 2012, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

COUNT 4

On or about November 8, 2012, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

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COUNT 5

On or about December 3, 2012, within the District of Alaska, the defendant RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

COUNT 6

On or about December 5, 2012, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

COUNT 7

On or about December 7, 2012, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

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COUNT 8

On or about January 16, 2013, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

COUNT 9

On or about January 25, 2013, within the District of Alaska, the defendant, RHADAMES MARMOLEJOS, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

COUNT 10

On or about February 21, 2013, within the District of Alaska, defendants CHRISTOPHER THOMAS MEJIA and JARED THOMAS BOWERS did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, to wit: 100 grams or more of a mixture and substance containing a detectable amount of heroin.

All of which is in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(B).

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COUNT 11

On or about February 21, 2013, within the District of Alaska, defendants CHRISTOPHER THOMAS MEJIA and JARED THOMAS BOWERS did, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Counts 1 and 10 of this Indictment, use and carry a firearm, and, in furtherance of said drug trafficking crime, did knowingly possess a firearm to wit: One IMIsp-21 .45 caliber semi-automatic pistol, serial number 33-001231.

All of which is in violation of Title 18, United States Code § 924(c)(1)(A)(i).

CRIMINAL FORFEITURE ALLEGATION

Upon conviction of the controlled substance offense alleged in Count 10 of this Indictment, an offense punishable by more than one year of imprisonment, defendants CHRISTOPHER THOMAS MEJIA and JARED THOMAS BOWERS, jointly and severally, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of said offense, pursuant to Title 21, United States Code, Section 853(a)(1), and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, pursuant to Title 21, United States Code, Section 853(a)(2), including without limitation to the following property:

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1. \$17,800.00 in United States Currency, seized on or about February 21, 2013.
2. \$10,100.00 in United States Currency, seized on or about February 21, 2013.

All of which is in violation of Title 21, United States Code sections 853(a) and (d).

A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/Erin W. Bradley
ERIN W. BRADLEY
United States of America
Special Assistant U.S. Attorney

s/Karen L. Loeffler
KAREN L. LOEFFLER
United States of America
United States Attorney

DATE: March 20, 2013